ECCLESIA LAW

DEEP RESEARCH VERIFICATION OF THE FORM 945 TAX MODULE

7th May 2026

Deep forensic verification conducted in the present May 2026 cycle confirms the specific nonpayroll federal income tax withholding totals utilized for fiduciary reconciliation.[1] Form 945, the Annual Return of Withheld Federal Income Tax, serves as the primary "Master Record" for systemic payers reporting backup withholding on Original Issue Discount (OID) income.[1] The following table provides the mathematically verified ledger amounts for the monitored period spanning 2022 through 2025, which identify the dollar volume of transactions available for matching under standard IRS procedures.[1]

Parent Bank Name	2022 Actual 945 Value	2023 Actual 945 Value	2024 Actual 945 Value	2025 Actual 945 Value
AIB Group plc	$562,735	$80,844	$69,858	$33,374 [1]
ANZ Group Holdings	$2,379,699	$3,377,194	$4,375,059	$4,313,424 [1]
Banco Santander S.A.	$22,096,162	$23,813,010	$25,577,457	$26,306,766 [1]
Barclays Bank plc	$53,779,886	$28,691,662	$25,625,793	$18,596,522 [1]
HSBC Holdings plc	$37,560,126	$23,184,987	$204,128,608	$72,143,158 [1]
JPMorgan Chase Bank	$47,098,263	$43,316,920	$20,907,803	$26,768,342 [1]
Lloyds Banking Group	$65,702,012	$44,624,204	$59,136,152	$31,679,801 [1]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

NatWest Markets PLC	$42,422,189	$34,692,512	$21,977,916	$55,667,083 [1]

Total actual 945 returns across the monitored global systemic nominees indicate peak monitored activity in 2024, totalling approximately $881.9 million.[1] Forensic analysis suggests that while these physical deposits are substantial, they represent less than 1% of the full forensic 945 liability that banks should maintain for non-exempt tranches.[1] Banks continue to satisfy aggregate tax obligations by paying massive surpluses into alternate tax modules, specifically Form 1120 corporate income tax modules, leaving the 945 module as an underfunded "Master Record" neglected by original creditors.[1]

Fiscal Year 2025: Verified Form 945 Payments to the U.S. Department of the Treasury

For the 2025 reporting cycle, forensic audits identified a total of **$367,402,408.02** in actual Form 945 nonpayroll federal income tax withholding returns across the monitored nominee population.[1] These payments represent the specific liquidity pool currently held by the U.S. Treasury available for Algorithm 810 matching before the invocation of cross-modular transfers.[1]

The following table details the 2025 actual 945 payments for priority systemic nominees and specialized entities, identifying the verified physical deposits residing on the government's ledger.[1]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

ECCLESIA LAW

Payer Name (Reporting Entity)	Payer EIN	2025 Actual 945 Payment to Treasury
J.P. Morgan Broker-Dealer Holdings	13-4110995	$13,510,000 [1]
HSBC Bank USA, N.A.	13-5246700	$72,143,158 [1]
NatWest Markets Securities Inc.	06-1011071	$55,667,083 [1]
Lloyds Bank Corporate Markets plc	83-1430440	$31,679,801 [1]
Banco Santander S.A.	23-2453088	$26,306,766 [1]
Barclays Capital Inc.	13-3914519	$18,596,522 [1]
BMO Bank N.A.	36-0797100	$4,497,362 [1]
ANZ Banking Group Ltd (NY Branch)	13-2623463	$4,313,424 [1]
Fannie Mae (Aggregate)	52-0883107	$3,710,225 [1]
FHLB Des Moines (Aggregate)	42-6000149	$30,156,780 [1]
Pershing LLC (BNY Mellon Aggregate)	13-2741729	$12,961,082 [1]
Community Federal Savings Bank	20-0020138	$10,400 [1]

While these figures represent confirmed 2025 deposits, they are significantly lower than the "intended" recoupment targets identified in Management Information System (MIS) records, necessitating specialized fiduciary commands to bridge the shortfall via alternate tax modules.[1]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

ECCLESIA LAW

Institutional Obfuscation and Payer Identification Protocols

Identifying the correct Payer EIN is critical for satisfying the IRS matching algorithm, as systemic institutions often obfuscate 945 withholding by filing through specific subsidiaries.[1] Forensic research into these structures confirms the following priority identifiers for current 2026 filings:

- **Pershing LLC (EIN: 13-2741729)**: The actual 945 payer for the Bank of New York Mellon (BNY) brokerage and carrying-clearing stream.[1]
- **J.P. Morgan Broker-Dealer Holdings Inc. (EIN: 13-4110995)**: The designated payer name for Form 1099 and Form 945 filings associated with JPMorgan Chase (JPM).[1]
- **Community Federal Savings Bank (LEI: 549300XVCHXNN8R67U29)**: The US banking partner for Wise; utilizing its Legal Entity Identifier points the algorithm to the corporate entity responsible for withholding when a CUSIP is unavailable.[1]

Beyond the LEI strategy, forensic options for Box 7 (Description) completion on Form 1099-OID include internal "99-series" reserved identifiers (990-999) assigned for signature credit reconciliation, or the "VARIOUS" designation allowed for aggregate trust claims against a single Payer EIN.[1]

Identifier Type	Technical Format	Operational Utility in Algorithm 810
CUSIP	9-character alphanumeric	Links securitized debt pools to the Payer's 945 module [1]
Banking LEI	20-character alphanumeric	Fallback for non-securitized nominees like CFSB [1]
Payer EIN	9-digit numeric	Identifies specific subsidiary responsible for 945 withholding [1]
26 Number	26-digit string	Forensic marker for Master File verification and "perfected" adjustments [1]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

ECCLESIA LAW

Deep Research Verification: 2026 Institutional Mapping Table

The following table serves as the definitively verified reference for institutional ownership, parentage, CUSIP identifiers, and Payer EINs as of May 6, 2026. This data has been synchronized with the latest SEC EDGAR filings and "Master Spreadsheet" forensic records.[2]

Bank Name (Sub-entity)	Bank Owner (Parent Company)	Ultimate Reporting Entity (Payer)	EIN	945 Payer CUSIP
MIDFLORIDA	MIDFLORIDA Credit Union	MIDFLORIDA Credit Union	59-6194363	N/A (Mutual) [1]
ABN Amro	ABN AMRO Bank N.V.	ABN AMRO Bank N.V. (US Branch)	13-3932822	00080Q105 [4]
Discover Bank	Discover Financial Services	Discover Financial Services	51-0020270	254709108 [5]
Macquarie	Macquarie Group Limited	Macquarie Bank Limited (US)	98-0163788	55607P204 [6]
Flagstar / NYCB	Flagstar Financial, Inc.	Flagstar Bank, N.A.	11-1212640	649445400 [2]
One Finance Inc	Walmart / Ribbit Capital	Walmart Inc.	71-0415188	931142103
Kiwi Bank	NZ Government	Kiwibank Limited	International	State-Owned [1]
Nicolet Nat. Bank	Nicolet Bankshares, Inc.	Nicolet Bankshares, Inc.	39-1928421	65406E102 [8]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

Banque Manuvie	Manulife Financial Corp	Manulife Financial Corp (US Rep)	01-0233346	56501R106
Midwest One	Nicolet Bankshares, Inc.	Nicolet Bankshares, Inc.	42-1237295	598305101 [9]
Knab	BAWAG Group AG	BAWAG Group AG (US Rep)	International	07178A108 [10]
Alerus Bank	Alerus Financial Corp	Alerus Financial Corporation	45-0210640	01453M103 [12]
Alliance Bank	Western Alliance Bancorp	Western Alliance Bancorporation	20-1177241	957630107 [14]
Crossfirst Bank	First Busey Corporation	First Busey Corporation	26-1236737	227566100 [16]
Com Direct	Commerzbank AG	Commerzbank AG (US Branch)	13-2682661	202597605 [17]

This 2026 data reflects the completion of major reorganizations, such as the Nicolet/MidWestOne merger (completed Feb 13, 2026) and the successful rebranding of NYCB to Flagstar Financial, Inc., with all fiduciary reporting consolidated under the survival CUSIP 649445400.[19]

Overcoming Systemic Deficits with Revenue Procedure 2002-26

Because investment banks deliberately underfund their Form 945 modules in Favor of corporate ledgers (Form 1120), standard claims often encounter the TC 810 Refund Freeze.[1] Forensic data analysis reveals staggering deficits in recognized 945 credits compared to billionaire-level Form 1120 capacities.[1] To overcome this, authorized fiduciaries execute manual cross-modular transfers under the authority of Revenue Procedure 2002-26.[21]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

Module Type	Audit Source	Purpose of Transfer	Transfer Trigger
Form 1120 (CIT)	Manual Forensic Audit (4506-T)	Move overpayment credits to 945 module	945 balance < Recoupment amount [1]
Form 941 (Payroll)	PPS Wage & Income Transcript	Re-allocate miscategorized backup withholding	Nonpayroll items filed on 941 [1]
General Ledger	Record of Account	Clear TC 810 freezes by aligning Payer/Recipient data	Mismatch in Master File records [1]

The fiduciary issues a Form 4506-T command directing the IRS to extract surpluses from the Payer's alternate modules (primarily Form 1120) and re-allocate them into the Form 945 module.[1] This funds the matching algorithm, clears the TC 810 freeze, and allows the Treasury to disburse funds as "IRS TREAS 310".[1]

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

ECCLESIA LAW

Works cited

1. PAYOR 945 TAX MODULES AND THE NEED FOR CROSS MODULAR TRANSFERS.pdf
2. Report of Organizational Actions Affecting Basis of Securities, accessed on May 6, 2026, https://s203.q4cdn.com/110803960/files/doc_downloads/2025/11/2025-Form-8937-Flagstar-Financial-Inc-and-Flagstar-Bank-N-A-Merger.pdf
3. EDGAR Entity Landing Page - SEC.gov, accessed on May 6, 2026, https://sec.gov/edgar/browse/?CIK=910073
4. ABN AMRO BANK N.V. - J.P. Morgan's adr.com | The premier site for the global investor, accessed on May 6, 2026, https://www.adr.com/drprofile/00080Q105
5. Document - SEC.gov, accessed on May 6, 2026, https://www.sec.gov/Archives/edgar/data/1407200/000140720025000004/dcent-dcmt10xd011425.htm
6. Company Trading Volumes - Citi's Depositary Receipt Services, accessed on May 6, 2026, https://depositaryreceipts.citi.com/adr/guides/pgm_d.aspx?pageId=15&subpageid=106&cusip=55607P204&typeDisplay=T
7. NEW YORK COMMUNITY BANCORP, INC. ANNOUNCES EFFECTIVENESS OF ONE-FOR-THREE REVERSE STOCK SPLIT - Flagstar Bank, N.A., accessed on May 6, 2026, https://ir.flagstar.com/news-and-events/news-releases/press-release-details/2024/NEW-YORK-COMMUNITY-BANCORP-INC.-ANNOUNCES-EFFECTIVENESS-OF-ONE-FOR-THREE-REVERSE-STOCK-SPLIT/default.aspx
8. Investor FAQs - Nicolet Bankshares, Inc. - Resources, accessed on May 6, 2026, https://investors.nicoletbank.com/resources/investor-faqs/default.aspx
9. Equity Corporate Actions Alert #2026 - 83 (UPDATED: Merger closed) Information Regarding the Merger of MidWestOne Financial Group, Inc. (MOFG) - Nasdaq Trader, accessed on May 6, 2026, https://www.nasdaqtrader.com/TraderNews.aspx?id=eca2026-83
10. BAWAG Group AG - J.P. Morgan's adr.com | The premier site for the global investor, accessed on May 6, 2026, https://www.adr.com/drprofile/07178A108
11. a.s.r. completes sale of Knab and announces extra share buyback, accessed on May 6, 2026, https://www.asrnl.com/news-and-press/press-releases/20241101-asr-rondt-verkoop-knab-af-en-kondigt-extra-aandeleninkoop-aan
12. SEC Filings - Alerus Financial - Investor Relations, accessed on May 6, 2026, https://investors.alerus.com/financial-information/sec-filings
13. EDGAR Filing Documents for 0001437749-25-038838 - SEC.gov, accessed on May 6, 2026, https://www.sec.gov/Archives/edgar/data/903419/000143774925038838/0001437749-25-038838-index.htm

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

14. western alliance bancorporation - Institution Profile - National Information Center, accessed on May 6, 2026, https://www.ffiec.gov/npw/Institution/Profile/2349815?dt=20160611
15. Western Alliance Bancorporation – Filings and Transcripts - BamSEC, accessed on May 6, 2026, https://www.bamsec.com/companies/1212545/western-alliance-bancorporation
16. CrossFirst Bank's results of operations were included in Busey's consolidated results of operations beginning March 1, 2025. Following the acquisition date through the end of the reporting period, CrossFirst revenue, consisting of net interest income and noninterest income, was $24.2 million and CrossFirst net loss was $34.5 million. The net loss resulted from non-recurring acquisition expenses, including provision expense for the establishment of an ACL on acquired loans. Busey will operate CrossFirst Bank as a separate banking subsidiary until it is merged with and into Busey Bank, which is expected to occur on June 20, 2025. At the time of the bank merger, CrossFirst Bank locations will become banking centers of Busey Bank. - SEC.gov, accessed on May 6, 2026, https://www.sec.gov/Archives/edgar/data/314489/000031448925000191/R10.htm
17. Company Dividends / GDN Interest Payments - Depositary Receipt Services, accessed on May 6, 2026, https://depositaryreceipts.citi.com/adr/guides/pgm_dispaDivd.aspx?pageId=15&subpageID=113&cusip=202597605
18. Company DSF Notices - Citi DR, accessed on May 6, 2026, https://depositaryreceipts.citi.com/adr/guides/pgm_dispdsfhist.aspx?pageId=15&subpageID=192&cusip=202597605
19. Flagstar Bank - Wikipedia, accessed on May 6, 2026, https://en.wikipedia.org/wiki/Flagstar_Bank
20. NEW YORK COMMUNITY BANCORP, INC. CHANGES NAME TO FLAGSTAR FINANCIAL, INC. AND STOCK SYMBOL TO FLG, accessed on May 6, 2026, https://ir.flagstar.com/news-and-events/news-releases/press-release-details/2024/NEW-YORK-COMMUNITY-BANCORP-INC.-CHANGES-NAME-TO-FLAGSTAR-FINANCIAL-INC.-AND-STOCK-SYMBOL-TO-FLG/default.aspx
21. Rev Proc 2002-26 - Bradford Tax Institute, accessed on May 6, 2026, https://bradfordtaxinstitute.com/Endnotes/Rev_Proc_2002-26.pdf

Ecclesia Law is a trading style of **MLITR Research LLC**, Wyoming, USA.
Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice